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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 21-CR-0193-HSG
	)	
Plaintiff,	)	[UNOPPOSED] MOTION AND [PROPOSED]
	)	ORDER TEMPORARILY MODIFYING
v.	)	CONDITIONS OF PRE-TRIAL RELEASE.
LUIS AVALOS,	)	
	)	
Defendants.	)	
	)	
	)	

**MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE**

On December 4, 2021, this Court ordered Mr. Avalos' release subject to rigorous conditions. During the past year, Mr. Avalos has been completely compliant. In fact, Mr. Avalos' previous pre-trial officer scheduled a hearing before this Court to laud the defendant's performance. See ECF No. 26. Since then, he has continued to do well, and is currently working two jobs.

Mr. Avalos' conditions of pre-trial release limit his traffic to the Northern District; he is also subject to a curfew. However, he wishes to travel to Hawaii from March 4, 2022 to March 8, 2022. Accordingly, Mr. Avalos is seeking to have this Court temporarily modify his conditions of release to allow him the aforementioned travel. He has already provided copies of his flight and hotel literary to his pre-trial services officer.

The Government "takes no position" regarding this request.

Pre-Trial Services Nelson Barao does not oppose this request.

**CONCLUSION**

For the reasons stated above, it is respectfully requested that this Court temporarily modify the conditions of pre-trial release.

Respectfully Submitted,

DATED: February 10, 2022

/s/  
ERICK GUZMAN  
Attorney for Luis Avalos

**[PROPOSED] ORDER**

IT IS HEREBY ORDERED: Based on the above stipulation of the parties and for good cause shown, Mr. Avalos' conditions of pre-trial release are modified as follows:

Between March 4, 2022 and March 8, 2022 at 7:00 P.M., the curfew and travel conditions of Mr. Avalos' pre-trial release are suspended to allow him to travel to Hawaii.

It is further ordered that Mr. Avalos remain in contact with his pre-trial officer throughout the trip, and contact pre-trial services immediately upon return to the Northern District of California.

**IT IS SO ORDERED** this \_\_\_\_\_ day of February, 2022.

DATED: \_\_\_\_\_

HON. LAUREL BEELER  
United States Magistrate Judge